

### REMARKS/ARGUMENTS

Favorable consideration of this application, in light of the following discussion, is respectfully requested.

Claims 33-37, 39-44, and 77-79 are pending in the present application. Claim 33 has been amended, and Claims 78 and 79 have been added by the present amendment. Support may be found in Applicants' originally filed disclosure, at least, on pages 27, 28, and 34. Thus, no new matter is added.

In the November 24, 2010 Office Action, Claims 33 and 44 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn et al. (U.S. Patent No. 5,134,564, hereinafter "Dunn") in view of Petersen et al. (U.S. Patent No. 5,225,978, hereinafter "Petersen"); Claims 37, 40, 41, and 43 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Petersen, in further view of Marcial et al. (U.S. Patent No. 7,340,421, hereinafter "Marcial"); Claims 34-36, 39, and 77 were rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Petersen, in further view of Bellinger et al. (U.S. Patent No. 6,023,705, hereinafter "Bellinger"); and Claim 42 was rejected under 35 U.S.C. §103(a) as unpatentable over Dunn and Petersen, in view of Marcial and Ashcroft et al. (U.S. Patent No. 7,364,667, hereinafter "Ashcroft").

The March 11, 2011 Advisory Action maintained the aforementioned rejections and further noted that Petersen "discloses the customization of a reconciler for a particular user and rules for expertly solving problems at the transaction level."

Addressing now the rejection of Claims 33 and 44 under 35 U.S.C. §103(a) as unpatentable over Dunn and Petersen, Applicants respectfully traverse this rejection.

Amended Claim 33 recites, in part,

an account reconciliation application executing,  
using the central processing unit, at the application  
database to create reconciliation documents that associate  
items of the ledger data with corresponding items of the

source data pertaining to the financial account and determine reconciliation rules to reconcile any differences between corresponding portions of the source balance and the ledger balance, the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles, each of the reconciliation profiles having individualized reconciliation rules for reconciliation of the financial account, wherein

at least one of the reconciliation profiles includes supplementary information that corresponds to a past reconciliation of the financial account, the supplementary information being applied to the reconciliation of the financial account.

The November 24, 2010 Office Action asserts, on pages 2-4, that Dunn and Petersen describe all of the features recited in Claim 33. Applicants respectfully traverse this assertion.

Dunn describes a system for computer-aided reconciliation that reconciles a first list (a bank statement) formed of a first number of first records and a second list (bank customer's list of records) formed of a second number of second records where the records affect the account balance for the bank statement.<sup>1</sup>

However, Dunn fails to teach or suggest, as is conceded on page 3 of the November 24, 2010 Office Action, the features of the reconciliation documents and the reconciliation profiles, and also fails to show the relationship between the reconciliation documents and the reconciliation profiles. Furthermore, since Dunn fails to teach the features of the reconciliation profiles, Dunn also does not describe that at least one of the reconciliation profiles includes supplementary information that corresponds to a past reconciliation of the financial account, the supplementary information being applied to the reconciliation of the financial account, as is recited in the present amended Claim 33.

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<sup>1</sup> Dunn: Abstract and columns 3-5.

To cure the aforementioned deficiencies of Dunn, the Office Action relies on the Petersen reference. Petersen discusses a bank document processing system for processing checks, deposit slips, and other financial documents which combines an automatic expert reconciliation system with a multi-tasking document processing apparatus.<sup>2</sup> In addition, Petersen's system may be customized for regional operations and banking particulars, thus allowing a predetermined subset of rules to be changed.<sup>3</sup> According to Petersen, the customization is carried out during the "install" cycle of the system, at which time the customizer is allowed to alter the executable code.<sup>4</sup>

Thus, Petersen merely teaches that a system may be customized for a particular customer (i.e., Bank of America) at the time of installation of the system. However, Petersen fails to teach or suggest the features of the reconciliation profiles. In particular, Petersen does not discuss that at least one of the reconciliation profiles includes *supplementary information that corresponds to a past reconciliation of the financial account, the supplementary information being applied to the reconciliation of the financial account*, as is recited in amended Claim 33. In other words, there is no teaching in Petersen that a profile includes information from a past reconciliation, and that this information is applied to the present reconciliation of the financial account.

In addition, this feature provides certain advantages that are not discussed in the applied references. For example, in a non-limiting embodiment, the supplementary information may speed up the reconciliation process and improve efficiency, since information discovered in a past reconciliation is applied to the present reconciliation process.

Accordingly, Applicants respectfully submit that the newly added feature of Claim 33 is neither taught nor suggested by the Petersen reference.

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<sup>2</sup> Petersen: Abstract.

<sup>3</sup> Petersen: column 16, lines 30-31 and 35-37.

<sup>4</sup> Petersen: column 16, lines 38-39 and 48-49.

Furthermore, it is respectfully submitted that Petersen also fails to teach or suggest other features of Claim 33. Even assuming *arguendo* that Petersen “discloses the customization of a reconciler for a particular user and rules for expertly solving problems at the transaction level,” as is asserted in the March 11, 2011 Advisory Action, and applying the broadest reasonable interpretation to the claim language, the generic statements of Petersen simply do not show the relationship between the reconciliation documents, the reconciliation profiles, and the individualized reconciliation rules, as recited in Claim 33.

For example, as previously noted, Petersen does not describe or suggest that the reconciliation documents are based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, as is recited in Claim 33. Furthermore, Petersen is also silent on the claimed feature of creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles, and that each of the reconciliation profiles has individualized reconciliation rules for reconciliation of the financial account, as is also required by Claim 33. Finally, Petersen does not describe the reconciliation documents and the reconciliation profiles, and that each of the reconciliation profiles has individualized reconciliation rules for reconciliation of the financial account.

Accordingly, Dunn and Petersen, whether taken alone or in combination, do not describe, suggest, or render obvious all of the features recited in Claim 33. Therefore, it is respectfully requested that the rejection of Claim 33, and claims depending therefrom, be reconsidered and withdrawn.

New dependent Claims 78 and 79 have been added to further define the hosting system recited in Claim 33. It is respectfully submitted that the cited references fail to teach

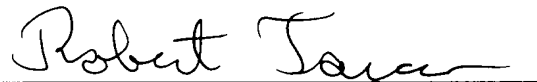
or suggest the features recited in Claims 78 and 79. Accordingly, Applicants believe Claims 78 and 79 contain allowable subject matter.

Accordingly, it is respectfully submitted that pending Claims 33-37, 39-44, and 77-79 are allowable.

Consequently, in view of the present amendment and in light of the above discussion, no further issues are believed to be outstanding in the present application and the present application is believed to be in condition for formal allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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